

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-163

[Published on 29 August 2019 and officially closed for comments on 12 September 2019]

Commenter 1: Emirates – Nasser Mohamed Almawed – 02/09/2019

Comment # 1

- A. Paragraph 3 does not clearly define the status of CMR task 361100-00001-1-C prior to accomplishment of the requirements of the AOT. Within the compliance time noted in Para (1) of AD 2019-0205, if CMR task 361100-00001-1-C becomes due, it is not clear if it is EASA's intension to have the CMR accomplished until the AOT is accomplished or the CMR is deemed superseded and the requirement and compliance time in the AD 2019-0205 take precedence.
- B. Additionally, the AD does not include installation of new PAD and EBAS S/w in SB 36-8062 as the terminating action to the CMR Task 361100-00001-1-C.
- C. We kindly request the following:
 - (1) Para (3) states that the CMR task 361100-00001-1-C is superseded by Para (1) of the Proposed AD.
 - (2) Para (7) states that modification of an aircraft as required by para (4) of the proposed AD and AFM changes as required by Para 5 of the proposed AD constitutes terminating action for the repetitive inspections as required by para (1) of the proposed AD and CMR task 361100-00001-1-C.

EASA response:

- A. Comment not agreed. This PAD does not introduce the CMR task. Operators are expected to be aware that EASA AD 2018-0098 requires compliance with (the tasks and limitations contained in) Airbus A380 ALS Part 3 at Revision 05, which includes the relevant CMR task. This CMR task remains required (by AD 2018-0098) until replaced by the actions as specified in the AOT. Paragraph (3) of the PAD makes sufficiently clear that, following the implementation of the AOT actions, the CMR task is no longer required. Since the Final AD for this PAD intends, once effective, to 'supersede' AD 2019-0205, the requirements of AD 2019-0205 will no longer be valid, the requirements having been taken over into (retained by) the new AD.**
- B. Comment not agreed. As stated in the EASA answer to point A. above, the AOT actions take over the CMR task actions – which are no longer required (see §(3) of the PAD) following AOT implementation. Consequently, the SW modifications only (need to) 'terminate' the AOT actions as required by paragraph (1).**



C. Comment not agreed. See EASA answers to points A. and B. above.

No changes have been made to the revised PAD in response to this comment.

